

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF IOWA
CEDAR RAPIDS DIVISION**

PARENTS DEFENDING
EDUCATION,

Plaintiff,

v.

LINN-MAR COMMUNITY SCHOOL
DISTRICT; SHANNON BISGARD, in
his official capacity as Superintendent of
Linn-Mar Community School District;
BRITTANIA MOREY, CLARK
WEAVER, BARRY BUCHHOLZ,
SONDRA NELSON, MATT
ROLLINGER, MELISSA WALKER,
and RACHEL WALL, in their official
capacities as members of the Linn Marr
Community School District School
Board,

Defendants.

Case No. _____

DECLARATION OF PARENT C

1. I live within the boundaries of the Linn-Mar Community School District (“Linn-Mar”) and am the parent of a school-aged child.
2. I am over the age of eighteen and under no mental disability or impairment. I have personal knowledge of the following facts and, if called as a witness, would competently testify to them.
3. I am a member of Parents Defending Education.
4. My daughter is enrolled in Linn-Mar High School.

5. I believe that people are either male or female, and that although gender dysphoria exists, it is statistically unlikely to persist past adolescence.

6. I am aware of research showing that the percentage of adolescents who identify as transgender or “non-binary” has nearly doubled over the past five years. I am also aware of clinical research establishing that adolescents are significantly more likely to announce a transgender or “non-binary” identity after other members of their social groups do the same.

7. Moreover, I know that adolescent girls are more likely to assert a transgender or “non-binary” gender identity than adolescent males.

8. I also know that children are increasingly likely to “experiment” with gender identity, particularly during adolescence, and that asserting a transgender or “non-binary” gender identity has increased significantly in Linn-Mar middle schools and Linn-Mar High School. Children often need affirmation, and the modern school environment provides that affirmation when kids “come out” as transgender or “non-binary.”

9. To my knowledge, my daughter is the only member of her friend group that does not identify as a member of the LGBT community. Based on my daughter’s particular life experiences and my conversations with her, I believe there is a substantial risk that she will receive a Gender Support Plan from school administrators or otherwise receive gender identity-related accommodations from Linn-Mar against my wishes.

10. I want to ask the District on a regular basis whether my child has requested or been given a Gender Support Plan, whether my child has made requests or actions have been taken concerning my child's gender identity, and whether the District has any other information that would reveal my child's "transgender status." I want to receive this information without seeking "permission" from my child. Policy 504.13-R, however, prohibits school officials from revealing any of this information to me without my child's permission.

11. I also want to exercise my fundamental right as a parent to guide my daughter's upbringing and to help my daughter navigate any issues that might arise regarding her perception of her gender identity.

12. Under the Policy, however, I know that when these issues arise, my role will be displaced by Linn-Mar administrators who do not know my child as well as I do. The Policy requires school officials to immediately accept and validate a child's expression of gender identity—regardless of their age—without questioning how the child arrived at that conclusion.

13. I am concerned that Linn-Mar administrators will create a Gender Support Plan and facilitate my daughter's gender "transition" without informing me or obtaining my consent. I also worry that Linn-Mar will prioritize my daughter's decisions about her "preferred pronouns" and "preferred name" at school over my wishes, even in the absence of a formal Gender Support Plan.

14. Because the Policy categorically forbids me from accessing certain information about my daughter without her consent, I will have no way of learning whether Linn-Mar is taking these actions. And because my daughter knows that I have strong feelings about this topic, I have no reason to believe that she would inform me about Linn-Mar's actions if she chooses to act against my wishes.

15. The Policy has caused me significant emotional distress because I know that my child is likely to be subjected to a Gender Support Plan or similar actions by Linn-Mar officials that are inconsistent with my fundamental values and implemented without my knowledge.

16. I am signing this declaration under a pseudonym because I live in Linn-Mar and, if my participation in this litigation becomes public, I fear reprisal from school officials, my child's teachers and fellow students, and members of the broader community.

Pursuant to 28 U.S.C. §1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed this 26 day of July, 2022

Parent C
Parent C

LINN-MAR COMMUNITY SCHOOL DISTRICT, SHANNON BISGARD, in his official capacity as Superintendent of Linn-Mar Community School District, BRITTANIA MORLEY, CLARK WEAVER, BARRY EUCHOLTZ, SONDRA NELSON, MATT ROLLINGER, MELISSA WALKER, and RACHEL WALL, in their official capacities as members of the Linn-Mar Community School District School Board.

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